

DOC #:

DATE FILED: 2/26/07

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December 21, 2007

Our ref: 445-0745

**RECEIVED**  
 DEC 27 2007

HAROLD BAER  
 U.S. DISTRICT JUDGE  
 S. D. N.Y.

\*ALSO ADMITTED IN NEW JERSEY  
 \*ALSO ADMITTED IN CONNECTICUT  
 \*ALSO ADMITTED IN WASHINGTON, D.C.  
 \*ALSO ADMITTED IN LOUISIANA

**Via Fax No: 212 805 7901**

The Honorable Harold Baer, Jr.  
 Daniel Patrick Moynihan U.S. Courthouse  
 500 Pearl Street  
 Room 2230  
 New York, New York 10007

RE: NOVOSHIP (UK) LTD. v. SURAMERICANA DE  
 TRANSPORTE PETROLERO C.A.  
 07 CV 8627 (HB)

Dear Judge Baer:

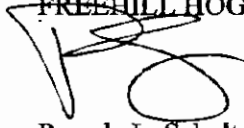
We represent the Plaintiff in the captioned action and write to request an adjournment of the conference scheduled for December 27, 2007 at 3:15 P.M. This is our first request for such relief.

By way of background, this matter involves a maritime attachment pursuant to Supplemental Rule B seeking security for its claims which are subject to London arbitration. Plaintiff has thus far not been successful in attaching any assets of the Defendant, but efforts to do so are continuing, and to our knowledge the Defendant is not represented here. Additionally, as the merits in the matter will be decided in London arbitration, discovery will not be conducted in these proceedings. Accordingly, we submit that the conference on December 27 would be of little benefit to the Court. Further, both counsel responsible for the matter on behalf of the Plaintiff will be unable to attend the conference on this date due to the holiday season.

NYDOCS1296038.1

For the reasons set forth above, we respectfully request an adjournment of the conference for an additional 30 days. We thank the Court for its consideration to this request.

Respectfully submitted,  
FREEHULL HOGAN & MAHAR, LLP



Pamela L. Schultz

PLS:lu

2/28/08

at 3:30  
but only if you have made  
some progress with  
attorneys we will  
adhere to that not later  
than 12/26/07

Harold Baer, Jr., U.S.D.J.

U.S.D.J.

Endorsement:

2/28/08 at 3:30 but only if you have made some progress  
otherwise we will adjourn once more but not likely again.